

319 Match Issues

Ecology must provide 40% match for EPA's 319 funds. This is purely a money issue. What it means is that Ecology must be able to show that the 319 work plan it submits to EPA is funded 60% by federal dollars and 40% by non-federal dollars. All work paid for by both the federal funds and the state match must be eligible to receive 319 funds.

An example of the budget page I write for the 319 grant follows:

BUDGET INFORMATION – Non-Construction Programs						
SECTION A – BUDGET SUMMARY						
Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.	66.640	\$ -0-	\$ -0-	\$ 7,703,400	\$ 5,135,600	\$ 12,839,000
2.	66.640.	\$ 300,579	\$ -0-			\$ 300,579
5. TOTALS		\$ 300,579	\$ -0-	\$ 7,703,400	\$ 5,135,600	\$ 13,139,579
SECTION B – BUDGET CATEGORIES						
6. OBJECT CLASS CATEGORIES	GRANT PROGRAM, FUNCTION, OR ACTIVITY				Total (5)	
	(1) Federal	(2) State	(3)	(4)		
a. Personnel	\$ 1,853,873				\$ 1,853,873	
b. Fringe Benefits	\$ 437,514				\$ 437,514	
c. Travel	\$ 60,268				\$ 60,268	
d. Equipment	\$ -0-				\$ -0-	
e. Supplies	\$ 120,200				\$ 120,200	
f. Contractual	\$ 4,624,050	\$ 5,135,600			\$ 9,759,650	
g. Construction	\$ -0-				\$ -0-	
h. Other (includes laboratory costs)	\$ -0-				\$ -0-	
i. Total Direct Charges (6a-h)	\$ 7,095,905	\$ 5,135,600			\$ 12,231,505	
j. Indirect Charges	\$ 908,074				\$ 908,074	
k. TOTALS (6i plus 6j)	\$ 8,003,979	\$ 5,135,600			\$ 13,139,579	
7. Program Income	\$ 8,003,979	\$ 5,135,600	\$	\$	\$13,139,579	

Federal Grant dollars **State Match** **Total Work plan budget**

How do things work now?

EPA must ensure that the federal 319 funds are matched and that the projects used for match are eligible for 319 funds that are awarded to the state.

All Ecology's grants require the recipient to provide 25% match. This means that for all external 319 grants, part of Ecology's match requirement will be provided by the recipient. The only complication is that some

grant recipients, usually conservation districts, use federal funds as part of the match. To simplify Ecology's tracking, we should not offer 319 grants to any applicant who proposes to use federal funds as match.

Once our grant recipients have provided their share of the match, Ecology must still provide the additional 15% for the external grants and 40% for the 319 funds we use internally.

Because Ecology receives annual 319 grants from EPA, and because it sometimes takes several years for external grant recipients to complete their projects, we always have several 319 grants to Ecology from EPA that are open at any one time. When Ecology disburses state funds for a grant project that meets 319 eligibility criteria, our Fiscal Office applies that amount as match to the oldest open 319 grant. This helps us to close out grants in a timely way and fulfills the requirement that the state provide 40% match. A secondary effect, however, is that this separates the money match issue from the "project match" issue.

This happens because projects don't always proceed in exactly the same way. For instance, a project that was funded three years ago may have been a slow starter for some reason, and may only now be resulting in disbursement of funds. A project funded last year may have been ready to go, and may be routinely receiving disbursements now. The match from both of these projects will be applied by our Fiscal Office to the same 319 grant as match even though they were initially offered funds in two different years, and neither of those years may be the year we received the 319 grant we're matching.

1. The money match issue.

Ecology must provide 40% match for the EPA 319 funds. What it means is that Ecology must be able to show that the 319 work plan it submits to EPA is funded 60% by federal dollars and 40% by non-federal dollars.

2. The project match, or environmental benefit leveraging issue.

According to EPA, Ecology has not really been telling the "project match" story, so we need to do a better job in the future of describing the projects used to match 319 funds; reporting on their progress, along with the progress of the 319-funded projects; and quantifying, as much as we can, the environmental benefit achieved when projects are concluded.

Here is an example of a work plan element from the current grant:

5. Nonpoint Technical Assistance and Compliance 2005/2006 (5 FTEs)

The purpose of this work plan element is to provide technical assistance to federal, state, local agencies, tribes, and special purpose districts on whether their activities, projects, and programs meet state water quality laws and regulations. Areas of technical assistance will include forest practices, agricultural activities, riparian restoration, and nonpoint source enforcement. This work plan element will apply in watersheds that implement nonpoint TMDLs, or in watersheds with plans that focus on protection of threatened waters or implementation activities to clean up waters.

Estimated two year cost of this work plan component – \$ 974,069

The total work plan budget of 974,069 = 779,255 funded through 319
389,627 funded through CCWF eligible projects

To get more intimate, Chad Atkins is funded through this work plan element. His 90,000 a year position is funded this way:

54,000 funded through 319
36,000 funded through match